

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND

In re:

WANDA L. GRANT  
Debtor

BK-23-10061  
CHAPTER 13

OBJECTION TO CONFIRMATION

The Trustee objects to confirmation of the debtor's Plan on the following grounds:

1. The Plan does not provide that all of the debtor's projected disposable income to be received will be applied to make payments under the Plan. See 11 U.S.C. §1325(b)(1)(B);
2. There are not sufficient payments being paid into the Plan to effectuate its provisions; and
3. The Plan is not feasible.

The plan indicates that an approximate mortgage arrearage of \$30,000.00 will be addressed in loss mitigation and thus not through the plan. In such circumstance, assuming loss mitigation is successful, then the plan may work as filed.

The trustee files this objection to preserve rights and out of an abundance of caution.

/s/Charles A. Pisaturo, Jr.  
Charles A. Pisaturo, Jr., Trustee  
400 Westminster St. Suite 54  
Providence, RI 02903  
Tel: (401) 223-5550  
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CERTIFICATION

I hereby certify that a copy of the within Objection was mailed, postage prepaid, to Ms. Wanda L. Grant, 111 Donelson St., Providence, RI 02908 and electronically mailed to Michael Zabelin, Esq. at [mzabelin@rils.org](mailto:mzabelin@rils.org) on April 5, 2023.

/s/Theresa S. French